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April 28, 2017

Writer's Direct Contact  
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The Honorable Jacqueline Scott Corley  
USDC, Northern District of California  
San Francisco Courthouse  
Courtroom F - 15th Floor  
450 Golden Gate Avenue  
San Francisco, CA 94102

Re: *Waymo LLC v. Uber Technologies, Inc. et al.*, Case No. 3:17-cv-00939

Dear Magistrate Judge Corley:

Yesterday, the Court ordered Waymo to provide a date when they started contemplating litigation against Anthony Levandowski and Uber. Last night, we received the attached email providing a date for Mr. Levandowski, but not Uber. We promptly responded and asked for the date that Google began contemplating litigation against Uber. As the court acknowledged, that is an important date. We respectfully request that Waymo be ordered to provide that date forthwith.

Sincerely,



Arturo J. González

From: "Gonzalez, Arturo J." <[AGonzalez@mofo.com](mailto:AGonzalez@mofo.com)>  
Date: April 27, 2017 at 9:33:22 PM PDT  
To: Jeff Nardinelli <[jeffnardinelli@quinnemanuel.com](mailto:jeffnardinelli@quinnemanuel.com)>  
Cc: UberWaymo <[UberWaymo@mofo.com](mailto:UberWaymo@mofo.com)>, "Boies Service  
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Waymo <[qewaymo@quinnemanuel.com](mailto:qewaymo@quinnemanuel.com)>  
Subject: Disclosure re Page RFP No. 4

Jeff,

What about potential legal action against Uber?

Arturo

Sent from my iPhone

On Apr 27, 2017, at 9:21 PM, Jeff Nardinelli <[jeffnardinelli@quinnemanuel.com](mailto:jeffnardinelli@quinnemanuel.com)> wrote:

- External Email -

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Counsel:

Pursuant to the Court's Order today regarding RFP No. 4, and without waiver of attorney-client privilege, attorney work product protection, or any other applicable privilege or protection and after a reasonable and diligent investigation, Waymo states that Google Inc.'s first communication in relation to the possibility of legal action against Anthony Levandowski was on or about March 23, 2016.

Best,  
Jeff

**Jeff Nardinelli**  
Associate,  
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